

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

LISA MATARAZZO,

Plaintiff,

v.

EQUIFAX INFORMATION
SERVICES LLC,

Defendant.

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CIVIL ACTION NO.

1:12-cv-01006-WSD-AJB

JOINT MOTION TO EXTEND SCHEDULING ORDER DEADLINES

Plaintiff, Lisa Matarazzo (“Matarazzo”), and Defendant, Equifax Information Services LLC (“Equifax”) (collectively, the “Parties”), through counsel, respectfully move the Court for a 60-day extension of the discovery period and subsequent scheduling order deadlines in this action pursuant to Local Rule 26.2B. In support of this motion, and for good cause shown, the Parties state as follows:

1.

On March 26, 2012, this action was transferred to this Court from the United States District Court for the Eastern District of Pennsylvania. The Court entered a scheduling Order in this case on October 2, 2012 providing for a six-month discovery period.

2.

The parties have diligently pursued discovery in this case, including exchanging written discovery and responses. The parties have also exchanged relevant documents. The parties are in the process of scheduling depositions to be taken during late March and April. The parties are not able to complete the depositions in March due to multiple scheduling conflicts on both sides.

3.

The Parties have diligently worked to undertake discovery in this matter. Due to the volume of information that has been produced by the Parties, the additional information that will be produced, and the depositions that the Parties anticipate will be necessary, completing discovery in the time allowed for under the original scheduling order is not possible.

4.

The parties will confer to establish a deposition schedule that will allow them to complete discovery on or before May 13, 2013. This request is based on the Parties' realistic assessment of the additional time needed to complete discovery. Barring any unforeseen circumstances, the parties do not anticipate the need for any further extensions of the discovery period.

5.

The Parties submit that an additional 60 days will afford all Parties the time necessary to complete discovery and that such extension will not prejudice any of the parties.

WHEREFORE, the Parties respectfully move this Court for entry of an Order extending the time for completing discovery and that the deadlines in the scheduling order be extended to reflect the 60-day extension of the discovery period.

Respectfully submitted this 15th day of February 2013.

/s/ Barry Goheen

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CERTIFICATE OF COMPLIANCE

I hereby certify that this document was prepared in Times New Roman 14 point font.

/s/ *Barry Goheen*
Barry Goheen

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	:	
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CERTIFICATE OF SERVICE

This is to certify that I have this day electronically filed a true and correct copy of the foregoing **JOINT MOTION TO EXTEND SCHEDULING ORDER DEADLINES** with the Clerk of the Court using the ECF system, which will send notification of such filing to the following counsels of record:

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Dated: February 15, 2013

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